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April 26, 2017

APPLICATION GRANTED. Chambers will deliver a copy of the documents emailed to chambers on April 26, 2017 to be filed under seal with the Clerk of Court. The Clerk of Court shall maintain these documents under seal. Triadou is directed to file a redacted version of the documents on ECF.

VIA ELECTRONIC MAIL AND COURIER

The Honorable Katherine H. Parker
 United States Magistrate Judge
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan Courthouse
 500 Pearl Street
 New York, New York 10007

Dated: 4/27/2017

KATHARINE H. PARKER
 United States Magistrate Judge
 04/27/2017

**Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,
 Case No. 15-CV-5345 (AJN) (KHP)**

Dear Judge Parker:

We represent Triadou SPV S.A. ("Triadou") and write to request that the Court accept for filing under seal the enclosed letter and exhibits in opposition to the letter motion filed by the City of Almaty and BTA Bank (together, "Almaty/BTA") seeking to compel the depositions of Marc Gillieron and Petr Krasnov. As required by Rule III.e of the Court's Individual Practices, the accompanying zip file includes a version of Triadou's letter and exhibits to remain under seal subject to the Court's approval (in the subfolder "To be filed under seal"), and a version of its letter with highlights reflecting proposed redactions and exhibits with slip-sheets to be filed publicly (in the subfolder "To be filed publicly").

Triadou's opposition letter attaches and references documents and testimony that Triadou has designated "Confidential" under the parties' Stipulated Protective Order entered in this case. (ECF No. 253). Triadou is prepared to file electronically the documents contained in zip file subfolder "To be filed publicly" should the Court grant this request. In this regard, Triadou has made an effort to comply with the Court's directive to limit the amount of information sealed.¹

As to the proposed redactions and remaining evidence, for the reasons stated in Triadou's letter motion in support of sealing Almaty/BTA's letter motion and accompanying exhibits –

¹ Exhibit 1 to Triadou's motion contains several pages of testimony from a transcript that has been designated as "Confidential," but Triadou has identified multiple pages to file publicly.



The Honorable Katherine H. Parker
April 26, 2017
Page 2

reasons that Triadou incorporates by reference here – Triadou respectfully requests that the Court accept for sealing Triadou’s proposed filings. (*See* ECF No. 310).²

Thank you for your consideration.

Respectfully submitted,

s/ Deborah A. Skakel
Deborah A. Skakel

cc: All Counsel of Record (*via* e-mail)

² Triadou noted in its April 25, 2017 letter to the Court that Triadou would (a) seek to file under seal portions of its letter in opposition to Almaty/BTA’s motion to compel depositions and the accompanying exhibits for the reasons set forth therein, (ECF No. 310 at 3), and (b) make this specific request in conjunction with the filing of its letter opposition, *id.*